

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re: FREE SPEECH SYSTEMS LLC, .	§ § § § § §	Chapter 11 (Subchapter V)  Case No. 22-60043 (CML)  Jointly Administered
Debtor.		

**DEBTOR AND SUBCHAPTER V TRUSTEE’S JOINT LIMITED OBJECTION TO  
EMERGENCY MOTION OF ALEXANDER E. JONES TO FIX A DATE BY WHICH  
DEBTOR MUST ASSUME OR REJECT EXECUTORY CONTRACT**

Free Speech Systems, LLC (the “Debtor”), the debtor and debtor-in-possession in the above-captioned chapter 11 case (the “Chapter 11 Case”) and Melissa Haselden, the subchapter v trustee (the “Subchapter V Trustee”) file this limited objection (the “Objection”) to *Emergency Motion of Alexander E. Jones to Fix a Date by which Debtor Must Assume or Reject Executory Contract* [Docket No. 349] (the “Motion”) filed by Alexander E. Jones (“Mr. Jones”) and state the following:

1. Mr. Jones seeks entry of an order fixing a date by which the Debtor must assume or reject an employment agreement between the Debtor and Jones (the “Contract”). The Debtor and Subchapter V Trustee object to the Motion at this time because the relief requested is premature.

2. Mr. Jones is without question central to the success of the FSS. However, the business operations of FSS continue to morph and improve through the effort of the CRO working with Mr. Jones and the Debtor’s employees. Decisions with regards to Mr. Jones’ employment agreement will certainly be informed by the developing business operations. Given the evolving landscape of the business and the case as well as the anticipated mediation, it is premature at this time to establish a date by which Mr. Jones’ employment agreement must be assumed or rejected.

January 11, 2023

*/s/ Raymond W. Battaglia*

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*/s/ Elizabeth C. Freeman*

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*Counsel for Melissa Haselden,  
Subchapter V Trustee*

**CERTIFICATE OF SERVICE**

I certify that on January 11, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Elizabeth Freeman

Elizabeth Freeman